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20 UNITED STATES DISTRICT COURT

21 FOR THE NORTHERN DISTRICT OF CALIFORNIA

22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO,¹ et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF ROBIN S. THOLIN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ADMINISTRATIVE RELIEF TO
EXCEED PAGE LIMITATION FOR
REPLY IN SUPPORT OF EX PARTE
MOTION FOR TEMPORARY
RESTRAINING ORDER AND ORDER TO
SHOW CAUSE**

DECLARATION OF ROBIN S. THOLIN

I, Robin S. Tholin, declare as follows:

1. I am a member in good standing of the State Bar of California and the bar of this Court. I represent all of the Plaintiffs in this action. I make this declaration pursuant to Local Rule 7-11(a).

2. Pursuant to this Court's order of February 24, 2025, Defendants' Opposition to Plaintiffs' Motion for a Temporary Restraining Order was due on February 26, 2025 at 10 a.m., and Plaintiffs' Reply deadline was set for midnight on February 26, 2025. Given this schedule, Plaintiffs were drafting the reply throughout the day, and it was not completed until after 11 p.m.

3. At 10:23 p.m., I emailed Defendants' counsel, informing them that Plaintiffs needed additional pages for the reply, and seeking their agreement to stipulate to an extension of seven pages.

4. I did not receive a reply to that email before the deadline for filing the reply.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on February 26, 2025, in Oakland, California.

Rud. Hart

Robin S. Tholin